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Our File #

Attorneys for Gerald T. Raynor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

FILED
FROM OVERNIGHT BOX
MAR 16 2001
KEVIN E. JOHNSON
UNITED STATES
BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

In re) No. 97-14228-PHX-GBN

CHARLES THOMAS BROWN, d/b/a
TOM BROWN PREFERRED TRUST
COMPANY,

Chapter 7

Debtor.

MAUREEN GAUGHAN, Chapter 7
Trustee,

Adversary No. 99-00746 - *ECF*

Plaintiff,

v.

ANN AKAMINE, et al,

Defendants.

**AFFIDAVIT OF GERALD RAYNOR IN SUPPORT OF
MOTION TO VACATE JUDGMENT FOR LACK OF
PERSONAL JURISDICTION**

STATE OF ARIZONA)
County of Maricopa) ss.

I, Gerald Raynor, being first duly sworn, depose and say:

1. My name is Gerald Raynor. The statements contained in this
Affidavit are based upon my personal knowledge and observations.

2. I make this appearance in this proceeding solely for the
purpose of contesting the Court's personal jurisdiction over me and the

1 validity of the Default Judgment entered against me in the above-captioned
2 matter.

3 3. During the entire pendency of this adversary proceeding I have
4 been and am a resident of Cave Creek or Phoenix, Arizona. My usual place
5 of business is in Cave Creek or Phoenix, Arizona.

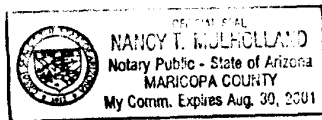
6 4. I have made no appearance nor participated in the
7 administrative proceeding captioned above. I have made no appearance in
8 and have not participated in the above-captioned adversary proceeding. I
9 had no knowledge of the above-captioned adversary proceeding and,
10 consequently, did not know that I had been named a Defendant in that
11 proceeding until I received a copy of the Default Judgment entered against
12 me from the Trustee's counsel on or about February 21, 2001.

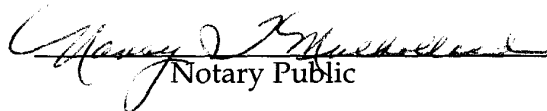
13 5. I am not in any way associated with the business known as
14 "Sunny's Pizza" located at 1301 East University Drive, #116, Tempe,
15 Arizona, nor am I in any way related to or associated with any employee,
16 agent or owner of the aforementioned business. Indeed, I have never been
17 to the premises of the aforementioned business.

18 Further affiant sayeth not.

19
20 
21 Gerald Raynor

22 SUBSCRIBED AND SWORN to before this 15 day of March, 2001.



25 
26 Notary Public

27 Notary Expiration Date

28 COPY of the foregoing mailed this

AYERS & BROWN, P.C.

4227 North 32nd Street, First Floor
PHOENIX, ARIZONA 85018
(602) 468-5700

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ic day of March, 2001, to:

T. Brent Galligan
Ryley Carlock & Applewhite
101 No. First Ave., #2700
Phoenix, AZ 85003-1973

